

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CLIFTON JETT TRANSPORT, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:21-cv-01064-JPH-DLP
)	
BARRETTE OUTDOOR LIVING, INC.,)	
)	
Defendant.)	

DEFENDANT'S OUTLINE OF DISPUTE, POSITION, AND SOLUTION

Defendant, Barrette Outdoor Living, Inc. ("Barrette"), respectfully submits this outline of the dispute between Barrette and Nonparty Amazon.com Services LLC ("Amazon"), Barrette's position on the dispute, and a proposed solution.

A. Outline of the Dispute Between Barrette and Amazon

On April 14, 2022, Barrette served a subpoena on Amazon requesting production of documents relating to Plaintiff, Clifton Jett Transport, Inc. ("CJT"). Exhibit A is a true and accurate copy of the subpoena Barrette served on Amazon.

On April 20, 2022, Amazon objected to Barrette's subpoena, and, on April 22, 2022, counsel for Barrette and Amazon conferred regarding Amazon's objections to Barrette's subpoena. Counsel for Barrette and Amazon discussed in detail the specific information Barrette was seeking from Amazon, which included (1) CJT's application to perform work for Amazon; (2) any offers or agreements between CJT and Amazon; and (3) documents showing how much CJT has earned from performing work for

Amazon from January 2019 through the present. Amazon's counsel indicated it would further discuss the production of documents relating to CJT with Amazon.

On May 18, 2022, Barrette's counsel followed up with Amazon's counsel regarding the production of documents relating to CJT, and, on July 14, 2022, July 22, 2022, August 2, 2022, August 5, 2022, and August 24, 2022, Amazon's counsel represented to Barrette's counsel that the requested document production was forthcoming. Exhibit B is a true and accurate copy of an email thread showing Amazon's counsel's representations regarding the forthcoming document production.

Amazon did not produce any documents, however, and the parties participated in a telephonic discovery conference with Judge Garcia on August 30, 2022. Judge Garcia recused himself during the conference. Following the discovery conference, however, Amazon began a "rolling" production of documents, which included an alleged agreement between Amazon and CJT, which was unsigned and undated, some extracted data regarding when Amazon and CJT began working together, and some invoices from CJT to Amazon from July 31, 2021, through July 9, 2022. Amazon, however, did not produce CJT's application to perform work for Amazon, signed or dated offers or agreements between CJT and Amazon, or documents showing how much CJT earned from Amazon from 2019 through June 2021.

Barrette followed up with Amazon on October 17, 2022, and specifically asked Amazon to complete its rolling production by October 20, 2022. Amazon did not respond to Barrette's requests and did not complete its rolling production. On October 28, 2022, Barrette's counsel requested dates for a telephonic discovery conference.

B. Barrette's Position on the Dispute

Barrette served a valid subpoena on Amazon, and, despite many promises to make a complete production, Amazon has failed to make a complete production. Amazon has waived any objections to Barrette's subpoena, and Barrette requests Amazon's full compliance with the subpoena.

C. Proposed Solution

Barrette proposes the Court order Amazon to produce the following documents no later than December 9, 2022.

1. Documents (if available) reflecting communications between Amazon and CJT or Clifton Jett ("Jett") from January 2, 2019, through the present.
2. Signed and dated (if available) applications submitted by CJT or Jett to Amazon from January 2, 2019, through the present.
3. Signed and dated (if available) offers and agreements between CJT or Jett and Amazon from January 2, 2019, through the present.
4. Documents reflecting services CJT or Jett provided to Amazon of its customers from January 2, 2019, through the present.
5. Documents reflecting compensation, payment, or other remuneration Amazon paid to CJT or Jett from January 2, 2019, through July 31, 2020.
6. A completed and signed copy of the Declaration of Business Custodian from Amazon.

Respectfully submitted,

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

By: s/ Kevin Roberts

Todd J. Kaiser, Atty. No. 10846-49

Kevin Roberts, Atty. No. 33822-49

300 N. Meridian Street, Suite 2700

Indianapolis, IN 46204

Telephone: 317.916.1300

Facsimile: 317.916.9076

todd.kaiser@ogletree.com

kevin.roberts@ogletree.com

Attorneys for Defendant

EXHIBIT A



OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

Attorneys at Law

111 Monument Circle, Suite 4600
Indianapolis, IN 46204
Telephone: 317.916.1300
Facsimile: 317.916.9076
www.ogletree.com

Melissa K. Nichols
(317) 916-2518
melissa.nichols@ogletreedeakins.com

April 14, 2022

Via Certified Mail

Amazon.com Services LLC
c/o Corporation Service Company, Registered Agent
135 N. Pennsylvania St., Ste. 1610
Indianapolis, IN 46204

RE: Request for Records – Clifton Jett Transport, Inc.

Dear Sir or Madam:

Please be advised that this law firm is currently involved in litigation and the lawsuit captioned *Clifton Jett Transport, Inc. v. Barrette Outdoor Living, Inc.*, Case No. 1:21-cv-01064-JPH-MG pending before the United States District Court, Southern District of Indiana, Indianapolis Division. We represent the defendant in this case and you have not been sued nor are you a party to the lawsuit. Based on documents and other information provided during the course of this lawsuit, we believe that you may have relevant information.

Enclosed please find a *Subpoena to Produce Documents with a Request for Production of Documents and Records to a Non-Party*. We would sincerely appreciate receiving **certified copies of any and all records** relating to Clifton Jett Transport, Inc. in your possession, custody, or control which may be emailed. Also enclosed, for your convenience, is a Declaration of Business Custodian for the purpose of certifying these records. If there is any fee associated with the photocopying of these records, please forward a statement of such costs to me and I will see that you are promptly paid for such costs.

Please note that the Subpoena requests your responses by **April 28, 2022**. Should you have any questions, please feel free to contact me.

Very truly yours,

OGLETREE DEAKINS LAW FIRM

MELISSA K. NICHOLS

Paralegal to Kevin E. Roberts

Enclosures

cc: Benjamin C. Ellis, Esq. (via e-mail with enclosures)
Aaron J. Williamson, Esq. (via e-mail with enclosures)

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

CLIFTON JETT TRANSPORTATION, INC.,

Plaintiff

v.

BARRETTE OUTDOOR LIVING, INC.,

Defendant

Civil Action No. 1:21-cv-01064-JPH-MG

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Amazon.com Services LLC, c/o Corporation Service Company, Registered Agent,
135 N. Pennsylvania St., Ste. 1610, Indianapolis, IN 46204

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached "Request for Production of Documents and Records to a Non-Party"

Place: Ogletree Deakins Law Firm, Attn: Kevin E. Roberts,
Esq., 111 Monument Cir., Suite 4600, Indianapolis, IN
46204

Date and Time:

04/28/2022 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 04/14/2022

CLERK OF COURT

OR



Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendant,
Barrette Outdoor Living, Inc., who issues or requests this subpoena, are:
Kevin E. Roberts, Esq., Ogletree Deakins Law Firm, 111 Monument Cir., Suite 4600, Indpls., IN 46204, 317.916.1300,
kevin.roberts@ogletree.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:21-cv-01064-JPH-MG

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____.

☒ I served the subpoena by delivering a copy to the named person as follows: _____

Certified Mail, Return Receipt Requested

_____ on *(date)* 04/14/2022 ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 04/14/2022



Server's signature

Kevin E. Roberts, Attorney

Printed name and title

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

111 Monument Circle, Suite 4600

Indianapolis, IN 46204

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CLIFTON JETT TRANSPORT, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:21-cv-01064-JPH-MG
)	
BARRETTE OUTDOOR LIVING, INC.,)	
)	
Defendant.)	

**REQUEST FOR PRODUCTION OF DOCUMENTS
AND RECORDS TO A NON-PARTY**

TO: Amazon.com Services LLC
c/o Corporation Service Company, Registered Agent
135 N. Pennsylvania St., Ste. 1610
Indianapolis, IN 46204

Defendant, Barrette Outdoor Living, Inc. (“Defendant”), by counsel and pursuant to Rules 34 and 45 of the Federal Rules of Civil Procedure, hereby requests production of a certified and authenticated copy of documents and records pertaining to Clifton Jett Transportation, Inc.

DEFINITIONS

1. “You” or “your” shall mean Amazon.com, Inc., your agents, employees, representatives, servants, attorneys or anyone acting on your behalf.
2. “CJT” or “Plaintiff” refers to Plaintiff Clifton Jett Transportation, Inc. and its predecessors, successors, assigns, subsidiaries (whether or not wholly owned), affiliated and related companies, employees and agents, including any parent, subsidiary and affiliated entities, as well as its officers, directors, agents, employees, and attorneys.
3. “Document” or “Documents” as used herein means any document or electronically stored information regardless of where located, and includes, but is not limited to: correspondence,

letters, memoranda, agreements, contracts, records, communications, reports, invoices, studies, summaries, minutes, notes, agenda, bulletins, diaries, logs, announcements, calendars, appointment books, transcripts, pleadings, drafts, analyses, projections, punch cards, printout sheets, invoices, purchase orders, instructions, charges, manuals, brochures, schedules, telegrams, teletypes, photographic matter, video tape, movie film, microfilm, worksheets, books, magazines, notebooks, handbooks, charts, tables, computer disks, data processing disks or tapes, electronically stored information, sound reproductions or recordings, however recorded, whether they are still on tape or transcribed to writing, and any other writings or documents. In all cases where originals and/or prior drafts and/or non-identical copies are not available, “documents” or “documentary evidence” also means genuine, true and correct copies of originals and/or copies of prior drafts and/or copies of non-identical copies.

4. “Communication” means any oral or written exchange or transmission of words, ideas, or information with another person or persons including, without limitation, all discussions, conversations, conferences, meetings, e-mail messages, speeches, questions, and any and all printed, typed, hand-written, or other readable documents, and any drafts or versions thereof, text messages and messages conveyed through social media, including but not limited to, Facebook, Twitter and LinkedIn.

5. “Identify” means, for a Document, to furnish a description of the Document, including its subject matter, the names of the parties who prepared and received it, its date, and any identifying number or code, and to furnish the name of the present custodian of the Document and the date that the present custodian of the Document obtained possession of the Document. In lieu of identifying a Document in the detail requested, a copy of the Document may be attached to Your answers, provided that any of the aforementioned identifying information not appearing on

the face of the Document is specifically stated in the answers. “Identify,” for a natural person, means a request for that person’s name, current home address and telephone number, and the name, address and telephone number of that person's current employer or business.

REQUESTS

1. Any and all documents reflecting communications between Amazon and Clifton Jett (“Jett”) from January 2, 2019, through the present.

2. Any and all documents reflecting communications between Amazon and CJT from January 2, 2019, through the present.

3. Any and all documents reflecting applications submitted by Jett or CJT to Amazon from January 2, 2019, through the present.

4. Any and all documents reflecting agreements between Jett or CJT and Amazon from January 2, 2019, through the present.

5. Any and all documents reflecting services Jett or CJT provided to Amazon or its customers from January 2, 2019, through the present.

6. Any and all documents reflecting compensation, payment, or other remuneration Amazon paid to Jett or CJT from January 2, 2019, through the present.

This Request for Production is made pursuant to Rules 34 and 45 of the Federal Rules of Civil Procedure:

1. Amazon.com Services LLC is entitled to security against damages resulting from its response to this Request for Production of Documents and Records.

2. Amazon.com Services LLC may respond to this Request for Production by submitting to its terms, or by proposing different terms, or by objecting specifically or generally to the request by serving a written response to Kevin E. Roberts, OGLETREE, DEAKINS, NASH,

SMOAK & STEWART P.C., 111 Monument Circle, Suite 4600, Indianapolis, Indiana, 46204, within 14 days or by moving to quash as permitted by Rule 45(d) of the Federal Rules of Civil Procedure.

3. The failure of Amazon.com Services LLC to respond to this Request for Production or to object to it, or to move to quash it as provided by the applicable Federal Rules of Civil Procedure will subject it to a motion to compel production pursuant to Rule 37 of the Federal Rules of Civil Procedure.

Respectfully submitted,

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

By: s/ Kevin Roberts

Todd J. Kaiser, Atty. No. 10846-49

Kevin Roberts, Atty. No. 33822-49

111 Monument Circle, Suite 4600

Indianapolis, IN 46204

Telephone: 317.916.1300

Facsimile: 317.916.9076

todd.kaiser@ogletree.com

kevin.roberts@ogletree.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2022, a copy of the foregoing was served via email to the following attorney(s) of record:

Benjamin C. Ellis
bellis@hkm.com

Aaron J. Williamson
awilliamson@hkm.com

s/ Kevin Roberts

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
111 Monument Circle, Suite 4600
Indianapolis, IN 46204
Telephone: 317.916.1300
Facsimile: 317.916.9076

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

CLIFTON JETT TRANSPORT, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:21-cv-01064-JPH-MG
)	
BARRETTE OUTDOOR LIVING, INC.,)	
)	
Defendant.)	

DECLARATION OF BUSINESS CUSTODIAN

I hereby certify that the attached _____ pages is a true and complete copy of the records pertaining to Clifton Jett Transport, Inc. and kept in the office of _____, and I am the legal custodian and keeper of said records on behalf of said business. I further certify that said records were made and kept in the regular course of said business, that it was the regular practice of said office for such records to be made, and that the records were made at the time of the events, transactions or occurrences to which they refer or within a reasonable time thereafter by a person with knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____.

CUSTODIAN OF RECORDS

PRINT CUSTODIAN NAME

EXHIBIT B

Roberts, Kevin E.

From: King, Michelle <MichelleKing@dwt.com>
Sent: Wednesday, August 24, 2022 12:11 PM
To: Roberts, Kevin E.; McCray, Lauren
Cc: Nan, Mindy; Crawford, Donna; Kaiser, Todd J.; Howard, Jim; Day, Alon
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Thank you. Let's go with the 30th and I expect to have the materials ready well in advance so that we can ultimately strike the same. Thank you Kevin.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>
Sent: Wednesday, August 24, 2022 9:04 AM
To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Lauren and Michelle,

Please commit to a date and time to hold the conference with Magistrate Judge Garcia. If we receive documents before the conference, we can discuss cancelling the conference after we've reviewed the documents.

Thanks,
Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>
Sent: Wednesday, August 24, 2022 11:53 AM
To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Good morning. The data was just received, and I am reviewing now for production. We should be able to these records to you today or tomorrow at latest. Upon receipt, will you please confirm that you will strike any pending associated motions? Thank you.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>
Sent: Wednesday, August 24, 2022 8:27 AM
To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Lauren and Michelle,

We still have not received any documents from Amazon. We've reached out to Magistrate Judge Garcia's case manager to schedule a telephonic discovery conference with Judge Garcia to discuss Amazon's failure to produce any responsive documents.

Outlined below are the available times:

1. Friday, August 26, 2022, at 1:00 p.m. E.S.T.
2. Tuesday, August 30, 2022, at 9:30 a.m. E.S.T. or 10:30 a.m. E.S.T.
3. Friday, September 2, 2022, at 10:00 a.m. E.S.T. or 10:30 a.m. E.S.T.

Lauren: Please let us know your availability for the discovery conference at your earliest convenience. We'd like to get back to Judge Garcia's case manager as soon as possible.

Last, attached for your file is Barrette's memorandum in support of its motion to hold Clifton Jett Transport in contempt of court related to CJT's failure to produce responsive documents. We continue to hope Amazon will produce responsive documents without the need for expensive and time-consuming motion practice.

Best regards,
Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>
Sent: Friday, August 5, 2022 11:16 AM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Good morning counsel. I have received the collection and it is being reviewed and prepared for production which I anticipate you will have by EOD Monday. I will be in touch soon with the production. Thank you kindly and happy Friday.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>
Sent: Friday, August 5, 2022 7:54 AM
To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Lauren and Michelle,

We still have not received any documents. We will be contacting the magistrate judge to obtain compliance with the nonparty request.

Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022
Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>
Sent: Tuesday, August 2, 2022 12:10 PM
To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

My sincere apologies Kevin. I was out sick most of last week. I have the data and am reviewing it with the intention to have it to you by EOD tomorrow. I sincerely appreciate your patience and courtesy, and the gentle reminder. I will have these ready quick as I can. Thanks much and back soon.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>
Sent: Tuesday, August 2, 2022 7:45 AM
To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Lauren and Michelle,

We did not receive any records from Amazon last week, and we still have not received any documents in response to Barrette's request to Amazon. We cannot wait any longer.

Please produce the records no later than close of business on Wednesday, August 3, 2022. If we do not receive the records by that time, we will need to schedule a conference with Magistrate Judge Garcia, who already has indicated that he believes the documents are relevant to the matter between Clifton Jett Transport and Barrette and that he expects Amazon to cooperate in producing relevant records.

Thank you for your continued efforts.

Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>
Sent: Friday, July 22, 2022 1:21 PM
To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Good morning and thank you for the follow up. I will be working over the weekend with the goal to have the records to you by Monday. I will follow up should anything change. Thank you and happy Friday!

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>
Sent: Friday, July 22, 2022 9:21 AM
To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>
Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedekins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Lauren and Michelle,

We're following up on this request. Will you be able to produce the documents today? If not, please provide a date certain next week for the production by the end of the day.

Thank you for your continued assistance.

Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022
Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: Roberts, Kevin E.
Sent: Monday, July 18, 2022 1:06 PM
To: 'King, Michelle' <MichelleKing@dwt.com>; 'McCray, Lauren' <LaurenMcCray@dwt.com>
Cc: 'Nan, Mindy' <MindyNan@dwt.com>; 'Crawford, Donna' <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedekins.com>
Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Hi Michelle,

We did not receive any documents last Thursday. Would you please re-send electronically today?

If you sent the documents to us via mail, then please let us know that as well. Thank you.

Kevin

PLEASE NOTE OUR NEW ADDRESS EFFECTIVE JUNE, 27, 2022
Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: Roberts, Kevin E.

Sent: Thursday, July 14, 2022 11:44 AM

To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Thank you, Michelle. We greatly appreciate it.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165
kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>

Sent: Thursday, July 14, 2022 11:42 AM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Ack sincere apologies. Let me locate and send to you today. Back by EOD with this data. Thank you for your kind patience and gentle reminders. Back shortly and thank you.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>

Sent: Thursday, July 14, 2022 7:22 AM

To: King, Michelle <MichelleKing@dwt.com>; McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Michelle,

Thank you. Unfortunately, we still have not received any documents to our requests.

Please provide the documents no later than July 15, or, at a minimum, provide a reasonable date certain when documents will be produced so that we may evaluate the parties' options.

Thank you for your continued assistance.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: King, Michelle <MichelleKing@dwt.com>

Sent: Thursday, July 7, 2022 1:28 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>; McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J.

<todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

My apologies for the delay. I should have a response and potential documents ready by end of the week. Back to you shortly. Thank you.

Best regards,
Michelle King
T: 206.757.8608
C: 206.247.5519

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>

Sent: Thursday, July 7, 2022 4:56 AM

To: McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J.

<todd.kaiser@ogletreedeakins.com>; King, Michelle <MichelleKing@dwt.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Hi Lauren and Michelle,

We still have not received any responsive documents or an update to our request. Would you please produce responsive documents or provide an update to our request by July 8.

We appreciate your continued assistance.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: Roberts, Kevin E.

Sent: Thursday, June 30, 2022 3:26 PM

To: 'McCray, Lauren' <LaurenMcCray@dwt.com>

Cc: 'Nan, Mindy' <MindyNan@dwt.com>; 'Crawford, Donna' <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>; 'King, Michelle' <MichelleKing@dwt.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Hi Lauren,

Would you please provide an update regarding our request? Thank you.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

300 N Meridian Street, Suite 2700, Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: Roberts, Kevin E.

Sent: Thursday, June 23, 2022 2:08 PM

To: McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>; King, Michelle <MichelleKing@dwt.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Hi Michelle,

Per Lauren's email below, would you please provide an update regarding our request? We appreciate your assistance.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

111 Monument Circle, Suite 4600 | Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: McCray, Lauren <LaurenMcCray@dwt.com>

Sent: Thursday, June 16, 2022 7:59 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>; King, Michelle <MichelleKing@dwt.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Hi, Kevin:

I'm out of the office starting tomorrow through next week. Please check in with Michelle next week for an update. She's helping with the request.

Lauren A. McCray | Davis Wright Tremaine LLP

Attorney,

WA Bar # 49976

CA Bar # 287408

Pronouns: She/Her

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8269 | Cell: (571) 331-1254 | Fax: (206) 757-7269

Email: laurenmccray@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>

Sent: Thursday, June 16, 2022 12:01 PM

To: McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Hi Lauren,

I'm following up on this email. If you could provide an update tomorrow, we'd appreciate it. Thank you.

Kevin

Kevin E. Roberts | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

111 Monument Circle, Suite 4600 | Indianapolis, IN 46204 | Telephone: 317-916-2165

kevin.roberts@ogletree.com | www.ogletree.com | [Bio](#)

From: McCray, Lauren <LaurenMcCray@dwt.com>

Sent: Friday, June 10, 2022 6:32 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Hi, Kevin:

I'll see what I can find out and be in touch next week, as several of our team members are out of the office.

Lauren A. McCray | Davis Wright Tremaine LLP

Attorney,

WA Bar # 49976

CA Bar # 287408

Pronouns: She/Her

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8269 | Cell: (571) 331-1254 | Fax: (206) 757-7269

Email: laurenmccray@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>

Sent: Thursday, June 9, 2022 1:18 PM

To: McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Hi Lauren,

We're circling back on our request. By chance, has your team been able to collect any of the requested documents? If you could provide an update by tomorrow, we'd greatly appreciate it.

Best regards,
Kevin

From: McCray, Lauren <LaurenMcCray@dwt.com>

Sent: Wednesday, May 18, 2022 2:36 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Thank you for following up. We are looking into the information we discussed/listed below. I will note your discovery deadline with my team. If there's additional information we need to get the information you seek, I'll reach out to you.

Best,
L

Lauren A. McCray | Davis Wright Tremain LLP

Attorney,

WA Bar # 49976

CA Bar # 287408

Pronouns: She/Her

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8269 | Cell: (571) 331-1254 | Fax: (206) 757-7269

Email: laurenmccray@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | **Seattle** | Washington, D.C.

From: Roberts, Kevin E. <kevin.roberts@ogletree.com>

Sent: Wednesday, May 18, 2022 8:50 AM

To: McCray, Lauren <LaurenMcCray@dwt.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J.

<todd.kaiser@ogletreedeakins.com>

Subject: RE: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[EXTERNAL]

Hi Lauren,

Thanks for taking my phone call a few weeks ago. I appreciated the opportunity to discuss Barrette Outdoor Living's subpoena to Amazon.

As we discussed on the phone, you indicated you would review Barrette's subpoena with Amazon and discuss the production of three discrete categories of documents:

1. Clifton Jett Transport's initial application to become an Amazon DSP owner/operator;
2. Any Amazon offers to or agreements with Clifton Jett Transport regarding Clifton Jett Transport being an Amazon DSP owner/operator; and
3. Statements showing how much Amazon has paid, or Clifton Jett has earned, as a result of becoming an Amazon DSP owner/operator from January 2019, through the present.

Liability discovery closes in this matter on June 17, 2022. We request that Amazon provide the requested documents by June 1, 2022, to ensure the parties have sufficient time to review the materials and conduct follow-up discovery.

If you'd like to discuss Amazon's response to the subpoena, please do not hesitate to give me a call at (317) 509-3888. Thanks in advance.

Kevin

From: McCray, Lauren <LaurenMcCray@dwt.com>

Sent: Thursday, April 21, 2022 4:59 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J. <todd.kaiser@ogletreedeakins.com>

Subject: Re: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Call my cell listed 571-331-1254

Sent from my iPhone

On Apr 21, 2022, at 1:58 PM, Roberts, Kevin E. <kevin.roberts@ogletree.com> wrote:

[EXTERNAL]

Thanks, Lauren. I'll give you a call tomorrow at 9 a.m. pacific time.

Kevin

From: McCray, Lauren <LaurenMcCray@dwt.com>

Sent: Thursday, April 21, 2022 4:44 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Nan, Mindy <MindyNan@dwt.com>; Crawford, Donna <DonnaCrawford@dwt.com>; Kaiser, Todd J.

<todd.kaiser@ogletreedeakins.com>

Subject: Re: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

Hello:

I am happy to discuss your subpoena. I am in Washington, so this would be Pacific Time.

Tomorrow, Friday 9-11. I can also provide times next week if that's better for you. Thanks

Sent from my iPhone

On Apr 21, 2022, at 9:18 AM, Roberts, Kevin E. <kevin.roberts@ogletree.com> wrote:

[EXTERNAL]

Lauren,

We represent Barrette Outdoor Living, Inc. in a matter against Clifton Jett Transport, Inc., and we received Amazon's objections to our nonparty discovery requests. We'd like to schedule a meet and confer to discuss Amazon's objections.

At your convenience, please let us know when you have time this week for a telephone conference. We look forward to working with you.

Thanks,
Kevin

From: Nan, Mindy <MindyNan@dwt.com>

Sent: Wednesday, April 20, 2022 6:02 PM

To: Roberts, Kevin E. <Kevin.Roberts@ogletreedeakins.com>

Cc: Crawford, Donna <DonnaCrawford@dwt.com>

Subject: Response: SUB1011069 Clifton Jett Transportation, Inc. vs. Barrette Outdoor Living, Inc.

[Caution: Email received from external source]

Dear counsel:

Attached, please find the response on behalf of Amazon, in the above-referenced matter. If you wish to discuss any of our objections, please reach out to the undersigned attorney to schedule a meet and confer.

Best regards,

Mindy Nan | Davis Wright Tremaine LLP

Paralegal Clerk

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104

Tel: (206) 757-8418 | Fax: (206) 757-7700

Email: mindynan@dwt.com | Website: www.dwt.com

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